

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

IN RE: SIG SAUER
PRODUCTS LIABILITY LITIGATION

PLAINTIFF NAME
PLAINTIFF ADDRESS

Plaintiffs,

v.

SIG SAUER, INC.
72 Pease Boulevard
Newington, New Hampshire 03801

Defendant.

**SHORT FORM COMPLAINT
JURY TRIAL DEMANDED**

CASE NO.

SHORT FORM COMPLAINT AND JURY DEMAND

Plaintiff(s) file this Short Form Complaint seeking judgment against Defendant, Sig Sauer, Inc., for injuries suffered as a result of [Insert name of Injured Person] experiencing and/or witnessing an unintended discharge of a Sig Sauer pistol.¹

Plaintiff(s) incorporate by reference the allegations contained within the Long Form Complaint and Demand for Jury Trial under ECF No. 28 in Case No.: 22-cv-536-JL, *Armendariz v. Sig Sauer, Inc.*, filed in the United States District Court for the District of New Hampshire and assigned to Judge Joseph N. LaPlante (hereafter, the “Long Form Complaint”). Plaintiff files this Short Form Complaint in compliance with this Court’s Order, ECF No. _____.

¹ The only pistols involved in the Sig Sauer Products Liability Litigation are the P320 and its variants, including the M17 and M18.

I. ALLEGATIONS COMMON TO ALL PLAINTIFFS

1. Plaintiff(s) incorporate by reference Paragraphs 1 – 152 in the Long Form Complaint as if set forth fully herein.

II. JURISDICTION AND VENUE

2. Plaintiff(s) allege the basis for jurisdiction and venue as follows:

☐ As alleged in the Long Form Complaint; **AND/OR**

☐ Other: _____

III. INDIVIDUAL ALLEGATIONS

3. The Injured Person (“Plaintiff”) _____ is an adult individual(s) whose current address is _____.

a. Name of current spouse and current street address, city, and state: _____

b. Date of marriage to spouse or widow(er) (if applicable): _____

4. The named Plaintiff(s) in this lawsuit is/are:

☐ The Injured Person (“Plaintiff”)

☐ The Plaintiff’s spouse (Plaintiff’s spouse is the “LOC Plaintiff”)

5. The incident in which Plaintiff was injured by a Sig Sauer pistol (“Incident”) occurred on _____.

6. The type of Sig Sauer Pistol that resulted in Plaintiff’s injury (“Subject Pistol”) was a _____.

7. The serial number of the Subject Pistol is:

☐ _____

☐ Presently unknown.

8. The Subject Pistol was:

- ☐ Purchased from a retail establishment
- ☐ Purchased privately
- ☐ Issued to the Plaintiff by his/her employer

9. The type of unintended discharge occurring during the Incident which resulted in Plaintiff's injury was a:

- ☐ Discharge while in holster
- ☐ Discharge outside of holster
- ☐ Drop Fire

10. At the time of the Incident, Plaintiff was a:

- ☐ A law enforcement officer
- ☐ A law enforcement officer and on duty
- ☐ A civilian

11. Plaintiff alleges that he/she was injured when, on the date of the Incident, Plaintiff's Subject Pistol discharged without an intentional trigger pull.

12. As a result of the Incident, Plaintiff suffered injuries included but not limited to the following_____.

IV. CLAIMS / COUNTS

13. **COUNT I – NEGLIGENCE (*Plaintiff v. Sig Sauer*)**

- ☐ Plaintiff adopts and alleges the same negligence theory in Paragraphs 319 – 326 in the Long Form Complaint as applied to this Plaintiff.

- ☐ Plaintiff alleges an additional negligence theory of liability against Sig Sauer which is attached hereto.

14. **COUNT II – STRICT PRODUCT LIABILITY (*Plaintiff v. Sig Sauer*)**

- ☐ Plaintiff adopts and alleges the same negligence theory in Paragraphs 327 – 332 in the Long Form Complaint as applied to this Plaintiff.
- ☐ Plaintiff alleges an additional negligence theory of liability against Sig Sauer which is attached hereto.

15. **COUNT III – LOSS OF CONSORTIUM (*LOC Plaintiff v. Sig Sauer*)**

- ☐ At the time of the Incident, LOC Plaintiff was the spouse of Plaintiff.
- ☐ As a result of the injuries sustained by Plaintiff, LOC Plaintiff has been and will continue to be deprived of the love, assistance, companionship, consortium and society of his/her spouse.

16. **ADDITIONAL COUNTS**

- a. If additional Counts and/or Counts directed to other Sig Sauer are alleged, the specific facts supporting these allegations must be pleaded by the Plaintiff(s) in a manner complying with the requirements of the Federal Rules of Civil Procedure and must be specifically identified on a separate sheet of paper attached to the Short Form Complaint.
- b. Plaintiff(s) assert the following additional theories against the Defendant(s) listed in paragraph 4:
- c. Plaintiff(s) assert the following additional theories against other Defendant(s):

WHEREFORE, Plaintiff(s) demands judgment in his/her/their favor and against Defendant for compensatory and enhanced compensatory damages, together with lawful interest, attorneys' fees, costs of suit, and all other claims for damages available by law in this Short Form Complaint and in Plaintiff(s)' Long Form Complaint, ECF No. 28 with Case No.: 22-cv-536-JL, *Armendariz v. Sig Sauer, Inc.*, filed in the United States District Court for the District of New Hampshire.

Respectfully submitted,

SALTZ MONGELUZZI & BENDESKY P.C.

Date: _____

By: /s/ Robert Zimmerman
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